



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

117 South Main Street, Dayton, Ohio 45422-1280

937-225-4435 — Fax: 937-225-3486

www.rapca.org

January 16, 2008

Certified Mail

Patrick Taylor
Environmental and Safety Manager
Miami Valley Publishing
678 Fairfield-Yellow Springs Rd.
PO Box 1679
Fairborn, OH 45324

WARNING LETTER

Dear Mr. Taylor:

On October 31, 2007, the Regional Air Pollution Control Agency (RAPCA) performed a compliance inspection of Miami Valley Publishing (MVP) (Ohio ID: 0829060354) located at 678 Fairfield Yellow Springs Road, Fairborn, Ohio. Miami Valley Publishing operates K001, K002, K004, K005, and K009 - lithographic web offset heatpresses controlled by regenerative thermal oxidizers (RTO). K001, K002, and K004 are controlled by RTO 15000 and K005 and K009 are controlled by RTO 9000. K001, K002, and K004 are permitted under Permit to Install 08-04542 issued on December 9, 2003. K005 is permitted under PTI 08-02674 issued on March 25, 2004. K009 is permitted under PTI 08-04282 issued on May 31, 2005. The Title V operating permit was issued on May 19, 2006 and became effective on June 9, 2006. During the October 31, 2007 inspection, RAPCA documented the following violations:

I. Failure to operate RTO 9000 and RTO 15000 at the required minimum temperatures

Pursuant to PTI 08-02674, PTI 08-04282, PTI 08-04542 and the Title V operating permit, the average combustion temperature within the RTOs, for any 3-hour block of time when the emissions units are in operation, is required to be not more than 50 degrees Fahrenheit below the average temperature during the most recent emissions tests that demonstrated the emissions units were in compliance. The most recent stack tests for the RTO 9000 was completed on February 9, 2006 and established a minimum operating temperature of 1542 degrees Fahrenheit. The most recent stack test for RTO 15000 was completed on February 25, 2006 and established a minimum operating temperature of 1514 degrees Fahrenheit. During the October 31, 2007 inspection, RAPCA reviewed the operating temperature records for these RTOs and documented that MVP operated K001, K002, K004, K005, and K009 when the 3-hour average temperature of

RTO 9000 and RTO 15000 was less than the required temperatures. On November 5, 2007, RAPCA requested that MVP revise the quarterly Title V deviation reports for 2007 to include all deviations of the minimum temperature limits for the RTOs.

On December 13, 2007, RAPCA received revised Title V deviation reports for the first through third quarters of 2007 which identified a total of 111 deviations from the required minimum operating temperatures for the RTOs. The majority of the deviations reported show that the RTOs operated at approximately 5 degrees less than the minimum required temperatures of each RTO.

The revised Title V deviation reports submitted by MVP indicate the deviations were caused when the manufacturer of the RTOs did not reset the minimum operating temperatures of the RTOs after the last stack tests were performed and as MVP had requested. However, there were several deviations where the RTOs operated at a substantially lower temperature while at least some of the emissions units were in operation. For example, for February 6, 2007 MVP reported that RTO 15000 operated 1309 degrees Fahrenheit and for August 9, 2007 MVP reported that RTO 15000 operated at 1350 degrees Fahrenheit. RAPCA does not believe these deviations can be explained by an incorrect minimum temperature set-point on the RTO.

Failure to operate the required control devices at the minimum required temperatures is a violation of PTI 08-02674, PTI 08-04542, PTI 08-04282, the Title V operating permit, and Ohio Revised Code (ORC) 3704.05.

II. Failure to submit timely deviation reports

Pursuant to PTI 08-02674, PTI 08-04282, PTI 08-04542, and the Title V operating permit MVP is required to submit deviation reports that include an identification of all 3-hour blocks of time when the emissions units were in operation during which the average combustion temperature within the RTOs did not comply with the temperature limitations. These reports are required to be submitted by January 31, April 30, July 31, and October 31 of each year. On December 13, 2007, RAPCA received revised Title V quarterly deviation reports for the first through the third quarters of 2007 which included the deviations identified above. Failure to submit deviations by the required dates is a violation of PTI 08-02674, PTI 08-04542, PTI 08-04282, the Title V operating permit, and ORC 3704.05.

The revised deviation reports received by RAPCA on December 13, 2007 state that MVP has corrected the minimum set-point of the RTOs and will be reviewing the operating temperatures on a daily basis to ensure that the minimum operating temperatures of the RTOs are maintained. RAPCA has determined these changes are sufficient to address the violations identified above. However, RAPCA is requesting that MVP submit additional information regarding the temperature deviations that occurred on January 2, February 6, August 9, August 13, August 22, 2007 for RTO 15000 and provide more detailed explanations of these deviations. These

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deviations were identified by RAPCA to be substantially less than the minimum operating temperature. At a minimum, the explanation should include which emissions units were operating at the time of the deviation, the actual length of time of the deviation, whether the deviation was the result of a malfunction, and the potential excess VOC emissions. This information shall be submitted within 30 days of receipt of this letter. If you have any questions regarding this matter, please contact me at 937-225-4004.

Sincerely,

A handwritten signature in black ink, appearing to read "Eileen C. Moran". The signature is fluid and cursive, with a long horizontal stroke at the end.

Eileen C. Moran
Air Pollution Control Specialist

cc: Lisa Holscher, USEPA
Tom Kalman, OEPA
Jeff Canan, RAPCA

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

PATRICK TAYLOR
 MIAMI VALLEY PUBLISHING
 678 FAIRFIELD-YELLOW SPRINGS RD
 PO BOX 1679
 FAIRBORN, OH 45324

2. Article Number
 (Transfer from service label)

7004 1160 0000 6165 4399

PS Form 3811, February 2004

Domestic Return Receipt

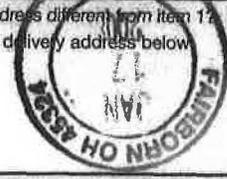
102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
x Patrick Taylor

B. Received by (Printed Name) *Patrick Taylor* C. Date of Delivery *1-17-08*

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PS Form 3800, June 2002

See Reverse for Instructions